## Case Service Report (RSA-911) Correction Procedures May 13, 2019

Despite the rigorous internal controls State VR agencies have implemented and continually refine related to collecting and reporting accurate information on the RSA-911, the Rehabilitation Services Administration (RSA) recognizes that agencies will occasionally report information that is incorrect. When these mistakes happen, RSA has established three ways agencies may address them. These correction procedures are outlined below.

When an agency identifies a reporting error and regardless of the specific correction procedure it uses to fix the error, RSA encourages the agency to assess the effectiveness of its internal controls to ensure its policies, procedures, quality assurance methods, and other tools to inform whether they could be enhanced to strengthen data collection and reporting and avoid future errors in reporting.

### **RSA-911 Implementation Timeline**

The RSA-911 included in <u>PD-16-04</u>, issued June 14, 2017, is effective for Program Years (PY) 2017, 2018, and 2019. Agencies will report information consistent with the RSA-911, included in <u>PD-19-03</u> and issued May 06, 2019, for PYs 2020 and 2021.

### **Background**

When State VR agencies began submitting quarterly RSA-911 reports in PY 2017, RSA received questions related to correcting errors after the Program Year's reporting period concludes. In other words, how State VR agencies may correct reported information that carries over from one Program Year to the next.

In an email dated August 1, 2017, RSA indicated that it will pilot a procedure in PY 2017 that permits State VR agencies to make necessary changes to all Data Elements in the RSA-911 by updating the record in subsequent quarterly submissions. RSA continued this pilot in PY 2018 and will permit such changes again in PY 2019.

However, RSA will use the data submitted as of August 15, when the fourth quarter's reporting period concludes, to calculate the WIOA primary indicators of performance and other information required for the WIOA Annual Report. RSA will not accept corrections to data to be used in calculations for these reports after August 15. RSA may review changes made to Data Elements and reserves the right to question or reject changes State VR agencies make to any information in RSA-911 reporting.

#### **Correction Procedures**

# 1. Correct the error internally and report the corrected information on future RSA-911 reports within the Program Year's reporting period

Within the Program Year's reporting period, agencies may internally correct any Data Element, that does not identify the individual. In other words, agencies may update, without RSA's approval, any Data Element <u>except</u> the following three:

- Data Element 5: Unique Identifier;
- Data Element 6: Social Security Number; and

• Data Element 7: Date of Application

<u>PD-16-04</u> and <u>PD-19-03</u> hyperlink require that agencies submit RSA-911 reports on a quarterly basis, no later than 45 days after the end of each quarter in accordance with the following schedule:

1. Reporting Period: July 1-September 30

Q1 Report Due: November 15

2. Reporting Period: October 1-December 31

Q2 Report Due: February 15

3. Reporting Period: January 1-March 31

Q3 Report Due: May 15

4. Reporting Period: April 1-June 30

Q4 Report Due: August 15

RSA will consider the most recently reported value as the correct value for any Data Element that does not allow multiple values. For example, a VR counselor records an applicant's date of birth in the case management system and the agency reports this date to RSA on its Q1 report. However, in Q2, the agency discovers that the applicant was born on a different date. The agency may report the corrected date of birth in Data Element 7 on its Q2 report due to RSA by February 15. In this example, RSA will use the birthdate reported in Q2 in the annual report calculations.

Data Elements 5, 6, and 7 cannot be updated, in this way, because RSA uses these three Data Elements to uniquely identify cases. If an agency reports information that changes these Data Elements in future RSA-911 reports, RSA will consider this as a newly reported case. If the agency is aware that one or more of these Data Elements has changed for any reason (e.g., correction to a Social Security Number or a merge that results in a Unique ID change) then corrections must be made to the individual's record on each of the previously reported reports in RSA's database before the agency may report the corrected Unique ID, SSN, or Date of Application. In these instances, agencies must contact RSA to request a correction, as explained here.

# 2. Request a correction to Unique Identifier, Social Security Number, and/or Date of Application

Agencies must request all corrections to Data Element 5: Unique Identifier, Data Element 6: Social Security Number, and Data Element 7: Date of Application by sending an <a href="mailto:encrypted">encrypted</a> file by email to <a href="mailto:encrypted">RSAData@ed.gov</a>. Agencies should also include the RSA Data Unit representative assigned to its agency on the request. Agencies should title the subject of the email as: RSA-911 Unique ID Change Request for (Insert Agency Name)

The email should include a brief summary of the agency's request and a file must be attached with a list of cases that includes, as appropriate, the following:

- Previously Reported Unique ID
- Revised Unique ID
- Previously Reported Application Date
- Revised Application Date
- Previously Reported SSN
- Revised SSN

Agencies may submit a csv file or Excel file and must use the following format:

Previous	Revised	Previous	Revised	Previous	Revised
Unique ID	Unique ID	<b>Application Date</b>	<b>Application Date</b>	SSN	SSN
ZZ0100004239	ZZ0100004240	11/05/2015	11/15/2015	88888888	99999999
ZZ0100004589		7/26/2016	7/26/2015		
ZZ0100012362	ZZ0100012372				
ZZ0200014876				44444444	55555555

Only the Data Elements requiring correction should be included in the file. If the agency is only correcting the Unique ID, the agency should not include values for Application Date and SSN. SSNs should include all nine numbers without dashes.

The csv or Excel file <u>must</u> be encrypted because it contains personally identifiable information.

To encrypt the csv or Excel file with WinZip, follow these steps:

- 1. Browse to and select the files to encrypt.
- 2. Right-click on the file(s) and select WinZip Zip and Email Plus. A new window displays.
- 3. In the Zip file name section, select the radio button to accept the default zip file or select the Use this name radio button and enter a name of choice.
- 4. In the Compression type section, click the radio button next to. Zip: Legacy compression (maximum compatibility).
- 5. Click the Encrypt Zip File checkbox to select it.
- 6. Click the OK button. The Encrypt window displays.
- 7. In the Encrypt window, enter a password up to 8 characters in length to protect the file.
- 8. Re-enter the password to confirm it.
- 9. In the Encryption method section, select 256-bit AES (stronger) as the encryption method.
- 10. Click the OK button to create and email the new password-protected encrypted zip file.
- 11. In a separate email or by telephone, send the password to RSAData@ed.gov.

### 3. Request that RSA Disapprove an RSA-911 Report and Resubmit

Finally, agencies may request that RSA disapprove a previous RSA-911 report so the agency may submit the report again with the corrected information within that Program Year's reporting period. If an agency submits an RSA-911 report and later identifies that it reported many errors, it may be more effective to resubmit the corrected report in its entirety rather than individually correcting each reporting error.

Agencies may request that RSA disapprove a previous RSA-911 report by emailing <a href="RSAData@ed.gov">RSAData@ed.gov</a> and the RSA Data Unit representative assigned to its agency. The email should include the following information:

- Agency Name;
- Program Year;
- Quarter Number;

- Justification to resubmit entire quarterly report;
- Summary of refinements the agency has made to its internal control to prevent incorrect reporting in the future; and
- Date by which the agency will resubmit the revised quarterly report to RSA.

RSA will only consider requests to disapprove quarterly reports and allow agencies to resubmit them if agencies make the request within the Program Year's reporting period. For example, if an agency requests to resubmit its Program Year 2019 Q1, Q2, Q3, or Q4 report before August 15, 2020 (when the Program Year 2019 reporting period concludes), RSA will consider the agency's request. If an agency requests to resubmit a prior Program Year's quarterly report and the reporting period for that Program Year has concluded, RSA will not consider this request. RSA will review each request on a case by case basis and may follow-up with the agency if more information is needed.

#### **Ouestions**

RSA is committed to partnering with State VR agencies to ensure information collected for and reported on the RSA-911 is accurate. RSA's Data Unit is available to answer questions or provide technical assistance related to these correction procedures. Please email <a href="mailto:RSAData@ed.gov">RSAData@ed.gov</a> or contact your <a href="mailto:RSAData@ed.gov">RSA State Liaison</a>.